

Natalie Martinez

From: Francis Gutierrez
Sent: Monday, September 12, 2005 3:09 PM
To: Natalie Martinez
Cc: Joann Ekblad; Peggy Reitzel; David Strickland
Subject: FW: International Mobile Termination Rates

DOCKET FILE COPY ORIGINAL

Hi Natalie, Don and Jim want the attached email from Mr. O'Kent entered into the foreign mobile termination record (IB-Docket No. 04-398). Your assistance is greatly appreciated! Please let either David and me know if you have any questions.

RECEIVED

Francis

SEP 26 2005

*** Non-Public: For Internal Use Only ***

Federal Communications Commission
Office of the Secretary

-----Original Message-----

From: James Ball
Sent: Friday, September 09, 2005 8:31 AM
To: David Strickland; Francis Gutierrez
Cc: Mark Uretsky; Anna Gomez; Claudia Fox
Subject: FW: International Mobile Termination Rates

Please have Mr. O' Krent's e-mail placed in the record and inform him when this has been done. You also may consider what additional information that you may want to ask him that may help our analysis. Thanks. Jim

*** Non-Public: For Internal Use Only ***

-----Original Message-----

From: Anna Gomez
Sent: Thursday, September 08, 2005 5:46 PM
To: James Ball
Subject: FW: International Mobile Termination Rates

FYI!

Nonpublic Information
For Internal Use Only

-----Original Message-----

From: Donald Abelson
Sent: Thursday, September 08, 2005 5:44 PM
To: 'mokne@ttcmail.net'

Cc: Anna Gomez; Breck Blalock; Claudia Fox; David Krech; Brad Lerner
Subject: Re: International Mobile Termination Rates

Thank you for your comments on this issue. I will ensure that your letter is put in the public record of this proceeding, which will form the basis of the FCC's further steps (if any) on this matter.

I appreciate your interest in this matter.

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Sent from my BlackBerry Wireless Handheld

-----Original Message-----

From: Marc O'Krent <mokne@ttcmail.net>

To: Donald Abelson <Donald.Abelson@fcc.gov>

Sent: Thu Sep 08 17:00:39 2005

Subject: re: International Mobile Termination Rates

Dear Mr. Abelson:

I'm the President of a small telecommunications company in Los Angeles. We are a voice mail , paging and IXC carrier fully licensed at the FCC and certificated by the California Public Utilities Commission. As such, we qualify for true wholesale resale rates from underlying carriers. Over the last several years, I have watched as the rates we pay to our Wholesale providers for International Mobile Termination have skyrocketed. I know that in 2004 the FCC issued " a notice of Inquiry" regarding this issue but I don't think anything has happened. Rates have continued to climb while our experience shows that more calls are made to International Mobile phones now than ever before. In this way, the foreign PTTs are circumventing the settlement rules put in place back in 1997 as they know that Mobile traffic is ever growing. Compounding this issue is the fact that if you look at the rate plans offered by Mobile Carriers overseas, the rates for calling back to Mobile phones in the US are not substantially different that what is charged to call land line US numbers. So consumers in the USA are getting ripped off by having to pay these outrageously high rates to call Mobile phones overseas while overseas consumers do not pay high rates to call US mobile customers. I think the PTT's are flaunting the FCC's rules, making a joke of the international settlement order or 1997 while forcing US consumer to subsidize international mobile calls for their own local customers.

To give you an example of how absurd this is, below is a chart of the *wholesale* rates we pay for dedicated termination to United Kingdom Mobile numbers. Remember these are our Wholesale rates (from Qwest Wholesale):

Carrier	Wholesale Cost (Cents per minutes)
---------	------------------------------------

02	22.83
H3G	28.70
Orange	26.77
TMobile	29.94
Vodafone	28.02

Realize that the above rates are our cost and before we add any of our markup! A survey of recent wholesale rates sent to us by Quest shows that the EU countries are the most expensive. Get this, my wholesale rate for China Mobile numbers is only 4 cents! Costa Rica Mobile wholesale is 8 cents! But France: 18 cents. Germany: 22 cents. Spain: 33 cents!! There are other non-EU countries that are also high, but it seems from reviewing the rates that the countries that tend to have a high volume of US originated calls have these extremely high rates.

I realize that the FCC has little control over foreign corporations, but certain with regard to TMobile and Vodafone there must be some sort of regulatory oversight that can be exercised as those company have large US subsidiaries.

I don't know if this is something that's more appropriately handled in the WTO, but somehow the FCC has to do a better job of leveling the playing field as there is no stopping the growth of International Mobile Phone service. Most times, the US consumer has no choice but to call an International Mobile number because that's the only number that the called party has given the poor conditions and long wait times on the PTT's wireline network.

I suggest the FCC consider imposing a surcharge on calls to US mobile numbers originated overseas until the foreign PTT's equalize the rates.

It makes no sense that my wholesale cost to the UK for land line calls is under 2 cents per minute by my wholesale cost to UK Mobile numbers is over 10 times that amount!

Thank you,,

-Marc O'Krent
President
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